

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Karen Taylor

Debtor.

Case No. 15-24728-SVK

Karen Taylor

Plaintiff,

v.

Adversary Proceeding No.:

City of Milwaukee,

Defendant.

COMPLAINT

The above-referenced Debtor and Plaintiff (hereinafter “Debtor”), Karen Taylor, by her attorneys at the Law Office of Rollie R. Hanson, S.C., hereby brings this Adversary Proceeding for the purpose setting aside a fraudulent transfer on the Debtor’s property located at 3863 S. 92nd Street, Milwaukee, WI 53228.

Parties

1. The Debtor, Karen Taylor, is adult and the Debtor in the above-captioned Chapter 13 Bankruptcy Proceeding filed under Chapter 13 on or about April 28, 2015.
2. Upon information and belief, the Defendant City of Milwaukee, is a Municipality and may be served at 200 East Wells Street, Milwaukee, WI 53202.
3. This Adversary Proceeding arises out of and is related to the Chapter 13 case of the Debtor. This Court has jurisdiction pursuant to 28 U.S.C. § 157, 1334, and 11 U.S.C. § 548. This is a core proceeding under 28 U.S.C. § 157(b)(2)(E) and (F).

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Facts

4. The Debtors filed this Chapter 13 Bankruptcy on April 28, 2015 in the Eastern District of Wisconsin and provided notice to the City of Milwaukee of said filing.
5. On January 21, 2015, and within one year prior to the filing of the chapter 13 petition, the Defendant completed an *in rem* foreclosure on the Debtor's property located at 3863 S. 92nd Street, Milwaukee, WI 53228. Further, the property is Taxkey number: 561-9967-000-5. The Legal Description of the property is as follows:

Lands in SE ¼ Sec 17-6-21 E 175' of N 50' of S 190.5' EXC ST

6. The transfer was made by the Debtor to the Defendant for \$0.00. At the time of such transfer, the above-described real property was worth, upon information and belief, not less than \$75,000.00. The transfer of such land for \$0.00 is less than a reasonably equivalent value for the property transferred.
7. At the time of such transfer, Debtor was insolvent at the time of the transfer or became insolvent in that after such transfer the fair value of the property remaining in the ownership of the Debtor was less than the sum of her debts.

WHEREFORE, the Debtor requests the following relief:

- 1) that the transfer of said real property to the Defendant be declared null and void;
- 2) that the Defendant be required to transfer and deliver to the Plaintiff said real property;
- 3) that, if the Defendant has disposed of such real property, it be required to account to the Plaintiff for the proceeds; and
- 4) that the Plaintiff have judgment for such other and further relief as is just.

Respectfully submitted this 28th day of April, 2015 at West Allis, Wisconsin.

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